

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

BERT VLADIMIR, Individually and On Behalf
Of All Other Similarly Situated,

Plaintiff,

v.

BIOENVISION, INC., CHRISTOPHER B.
WOOD, JOSEPH P. COOPER, STEVEN A.
ELMS, MICHAEL G. KAUFFMAN, ANDREW
SCHIFF, JAMES S. SCIBETTA, and PERSEUS-
SOROS BIOPHARMACEUTICAL FUND, LP,

Defendants.

07 Civ. 6416 (SHS)

NOTICE OF MOTION

PLEASE TAKE NOTICE that, upon the accompanying memorandum of law, and upon all pleadings and proceedings heretofore had herein, defendants Bioenvision, Inc., Christopher B. Wood, Joseph P. Cooper, Steven A. Elms, Michael G. Kauffman, Andrew Schiff and James S. Scibetta will move this Court, before the Hon. Sidney H. Stein, in Courtroom 23A of the United States Courthouse, 500 Pearl Street, New York, NY 10007, for an order: (i) dismissing the Amended Complaint, pursuant to Fed.R.Civ.P. 9(b) and 12(b)(6), with prejudice; and (ii) granting defendants such other relief in its favor as the Court deems proper.

Dated: Boston, Massachusetts
January 30, 2008

ROPES & GRAY LLP

By: /s/ John D. Donovan, Jr.

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